

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN – MILWAUKEE DIVISION**

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ROBYN MEATHENEY, individually and  
on behalf of all others similarly situated,

Plaintiff,

Case No.: 2:21-cv-00683-PP

**COLLECTIVE ACTION**

v.

ART’S PERFORMING CENTER, LLC  
dba SILK EXOTIC ON WATER, a  
Wisconsin Limited Liability Corporation;  
DOWNTOWN JUNEAU  
INVESTMENTS, LLC dba SILK EXOTIC  
ON WATER, a Wisconsin Limited  
Liability Corporation; SCOTT KRAHN, an  
individual; LYLE MESSINGER, an  
individual, and DOES 1 through 10,  
inclusive,

Defendants.

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**PLAINTIFFS’ NOTICE OF MOTION AND MOTION TO DISMISS DEFENDANTS’  
RETALIATORY COUNTERCLAIMS**

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**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on a date and time set by the Court, before the Honorable Pamela Pepper, Chief United States District Judge for the Western District of Wisconsin, located at 517 East Wisconsin Avenue, Milwaukee, WI 53202, plaintiffs Robyn Meatheney and Lanikiquia Taylor (collectively, “Plaintiffs”), by and through undersigned counsel, will, and hereby do respectfully move, this Court for an order dismissing defendants Scott Krahn and Lyle Messinger’s (“Messinger”) (collectively, “Defendants”) Counterclaims pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

This motion is based upon Rules 12(b)(1) and 12(b)(6), this notice of motion and motion, the brief in support submitted herewith, the Complaint on file in this action, the record in this case, and any other evidence and argument that may be adduced at hearing.

Dated: May 6, 2022

Respectfully submitted,

/s/ John P. Kristensen  
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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on Friday, May 06, 2022, the foregoing document titled **PLAINTIFFS' NOTICE OF MOTION AND MOTION TO DISMISS DEFENDANTS' RETALIATORY COUNTERCLAIMS** was served via CM/ECF upon the following parties pursuant to Fed. R. Civ. P. 5:

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*Co-counsel for Plaintiffs*

*/s/ John P. Kristensen*

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John P. Kristensen